

Jan 5 2006

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 05-22285-CIV-GOLD

GUSTAVO A. MORALES,

Plaintiff,

v.

CITIGROUP, INC. f/k/a THE NATIONAL
CITY BANK OF NEW YORK,

Defendant.

DEFENDANT CITIGROUP'S MOTION TO TRANSFER VENUE

Defendant, Citigroup, Inc., by and through its attorneys and pursuant to 28 U.S.C. § 1404(a), moves to transfer venue of this action to the Southern District of New York. This motion should be granted for the reasons set forth in the memorandum of law filed contemporaneously herewith.

Respectfully submitted,

/s/ Elena M. Marlow

**ASTIGARRAGA DAVIS MULLINS &
GROSSMAN, P.A.**

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CASE NO. 05-22285-CIV-GOLD

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to **Omar Ortega, Esq.**, Dorta & Ortega, P.A., 2222 Ponce de Leon Blvd., Suite 306, Coral Gables, FL 33134 this 5th day of January 2006.

/s/ Elena M. Marlow
Elena M. Marlow

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